

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.:

Activity No.: PER20080001
Agency Interest No.: 154259

Mr. Ron T. Ivy
Operations Manager
Castex Energy, Inc.
333 North Sam Houston Parkway East, Suite 1060
Houston, Texas 77060

RE: Modified Permit; Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field; Castex Energy, Inc.; Sorrel St. Mary Parish, Louisiana

Dear Mr. Ivy:

This is to inform you that the permit modification request for the above referenced facility has been approved under LAC 33:III.501. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets, and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Also enclosed is a document entitled "General Information." Please be advised that this document contains a summary of facility-level information contained in LDEQ's TEMPO database and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

The permit number cited below and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this ____ day of _____, 2008.

Permit No.: 2660-00288-01

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary

CSN:sbp

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
CASTEX ENERGY, INC.
ADELINE SUGAR FACTORY CO LTD #1 PRODUCTION FACILITY
JEANERETTE FIELD
PROPOSED MINOR SOURCE AIR OPERATING PERMIT MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on a Proposed Minor Source Air Operating Permit Modification for Castex Energy, Inc., 333 N. Sam Houston Pkwy. E., Ste. 1060, Houston, TX 77060 for the Adeline Sugar Factory Co. LTD #1 Production Facility-Jeanerette Field. **The facility is located approximately 6 miles east from Jeanerette and approximately 3 miles northeast from Sorrel, in St. Mary Parish, LA.**

Castex Energy, Inc. requested that the permit conditions and requirements established for the control flare (8-07-F), which controls emissions from the glycol dehydration unit, are made federally enforceable in order to maintain exemption from 40 CFR 63 Subpart HH area source GACT requirements. In addition, the company proposes to modify the facility by adding two gas operated pneumatic pumps (24-08-GOP and 25-08-GOP) and a blowcase vessel (26-08-BV), and revising emission limits for existing sources based on updated throughputs rate, emission factors, and currently facility conditions..

Estimated emissions from this facility in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	0.15	0.65	+ 0.50
SO ₂	0.01	0.07	+ 0.06
NO _x	12.60	33.51	+ 20.91
CO	21.01	45.77	+ 24.76
VOC	15.45	57.51	+ 42.06

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, April 13, 2009.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit modification application, supplemental documents, and proposed permit modification are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at St. Mary Parish Library, West End Branch, 100 Charenton Road, Baldwin, LA 70514.

Inquiries or requests for additional information regarding this permit action should be directed to Ms. Binh Nguyen, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3137.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 154259, Permit Number 2660-00288-01, and Activity Number PER20080001.

Scheduled Publication Date: Wednesday, March 11, 2009

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field
Agency Interest No.: 154259
Castex Energy, Inc.
Sorrel, St. Mary Parish, Louisiana**

I. BACKGROUND

Castex Energy, Inc.'s Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field is an existing oil and gas facility. The facility currently operates under Permit No. 2660-00288-00, issued February 28, 2008.

II. ORIGIN

A permit application and Emission Inventory Questionnaire (EIQ) dated July 24, 2008, were received requesting a permit modification. Additional information dated August 14, 2008, was also received.

III. DESCRIPTION

The Adeline Sugar Factory Co LTD #1 Production Facility is a typical oil and gas production facility that is used to treat and handle production from the Adeline Sugar Factory Co. Ltd. No. 1 and M.A. Patout & Son LTD No. 1 well completions. Production from the well is routed to separate line heaters and then to high pressure separators. Off-gas from the separators is piped to a glycol contact tower for drying and then sold by pipeline and used for facility fuel. Vapors from the glycol still column are piped through a condenser where condensed liquids are collected by a blowcase vessel and effluent vapors are routed to a control flare for combustion. The glycol dehydration unit is equipped with a glycol pump flash separator where off-gas is routed to the aforementioned control flare. Liquids from the high pressure separators are routed to individual low-pressure separators. Off-gas from the low-pressure separators is routed to the control flare for combustion. Oil from the low-pressure separators is routed to a heater treater for further separation. Water from the low-pressure separators is routed to on-site tanks for storage until hauled off-site by tank truck for disposal. Off-gas from the heater treater is routed to the aforementioned control flare. Oil from the heater treater is routed to on-site tanks for storage until hauled by tank truck for sales. Vapors from the oil & water storage tanks are routed to the control flare for combustion, except during brief intervals when thief hatches are opened for gauging, sampling, etc. Several gas operated pumps & insignificant storage tanks and a LP gas compressor are also located at this facility.

Castex Energy, Inc. proposes to modify the facility as follows:

- Add two gas operated pneumatic pumps (24-08-GOP and 25-08-GOP) and a blowcase vessel (26-08-BV), and
- Revise emission limits for existing sources based on updated throughputs rate, emission factors, and currently facility conditions.

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field
Agency Interest No.: 154259
Castex Energy, Inc.
Sorrel, St. Mary Parish, Louisiana

In addition to these modifications, the facility is requesting that the permit conditions and requirements established for the control flare (8-07-F), which controls emissions from the glycol dehydration unit, are made federally enforceable in order to maintain exemption from 40 CFR 63 Subpart HH area source GACT requirements.

Estimated emissions from this facility in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	0.15	0.65	+ 0.50
SO ₂	0.01	0.07	+ 0.06
NO _x	12.60	33.51	+ 20.91
CO	21.01	45.77	+ 24.76
VOC *	15.45	57.51	+ 42.06

*VOC speciation in tons per year:

LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions
2,2,4-Trimethylpentane	0.07
Benzene	0.36
Ethyl Benzene	0.02
Formaldehyde	0.09
Methanol	0.01
n-Hexane	2.44
Toluene	0.30
Xylenes	0.11
Total TAP's	3.40

IV. TYPE OF REVIEW

This permit was reviewed for compliance with Louisiana Air Quality Regulations and National Emission Standards for Hazardous Air Pollutants (NESHAP). New Source Performance Standards (NSPS) and Prevention of Significant Deterioration (PSD) do not apply.

This facility is a minor source of LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs) and an area source of 40 CFR Part 63 Hazardous Air Pollutants (HAPs).

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field

Agency Interest No.: 154259

Castex Energy, Inc.

Sorrel, St. Mary Parish, Louisiana

V. PUBLIC NOTICE

A notice requesting public comment on the proposed project was published in *The Advocate*, Baton Rouge, Louisiana, on <<Date>>, 200x; and in <<Local Paper>>, <<City>>, Louisiana, on <<Date>>, 200x. Copies of the public notice were also mailed to individuals who have requested to be placed on the mailing list maintained by the Office of Environmental Services on <<Date>>, 200x. All comments will be considered prior to a final permit decision.

VI. EFFECTS ON AMBIENT AIR

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

VII. GENERAL CONDITION XVII ACTIVITIES

Work Activity	Schedule	Emission Rates – tons per year				
		PM ₁₀	SO ₂	NO _x	CO	VOC
Misc. Sampling	n/a	---	---	---	---	0.25
Compressor Blowdowns	4/mo	---	---	---	---	0.68
Line Prep.	n/a	---	---	---	---	0.25
Vessel Prep.	n/a	---	---	---	---	0.20
Filter Replacement	n/a	---	---	---	---	0.05
Instrumentation Mech. Work	n/a	---	---	---	---	0.10
Tank Cleaning	n/a	---	---	---	---	0.38

VIII. INSIGNIFICANT ACTIVITIES

ID No.:	Description	Citation
1-07-LH-BS	Line Heater, 1.5 MM BTU/hr	LAC 33:III.501.B.5.A.1
2-07-HT-BS	Heater Treater, 0.5 MM BTU/hr	LAC 33:III.501.B.5.A.5
21-07-CST	(4) Chemical Storage Tanks, 200 gallons each	LAC 33:III.501.B.5.A.2
20-07-GST	(5) Glycol Storage Tanks, 55 gallons each	LAC 33:III.501.B.5.A.2
22-07-LOT	Lube Oil Tank, 300 gallons	LAC 33:III.501.B.5.A.3
23-08-LH-BS	Line Heater, 1.5 MM BTU/hr	LAC 33:III.501.B.5.A.1

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated July 24, 2008, along with supplemental information dated August 14, 2008.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
- B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
1. Report by June 30 to cover January through March
 2. Report by September 30 to cover April through June
 3. Report by December 31 to cover July through September
 4. Report by March 31 to cover October through December
- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]
- These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.
- XVIII. Provisions of the permit may be appealed to the secretary in writing pursuant to La. R.S. 30:2024(A) within 30 days from notice of the permit action. A request may be made to the secretary to suspend those provisions of the permit specifically appealed. The permit remains in effect to the extent that the secretary or assistant secretary does not elect to suspend the appealed provisions as requested or, at his discretion, other permit provisions as well. Construction cannot proceed, except as specifically approved by the secretary or

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

assistant secretary, until a final decision has been rendered on the appeal. A request for hearing must be sent to the Office of the Secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 154259 Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field
Activity Number: PER20080001
Permit Number: 2660-00288-01
Air - Minor Source/Small Source Mod

Also Known As:	ID	Name	User Group	Start Date
	2660-00288	Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field Castex Energy Inc	CDS Number Multimedia	10-30-2007 10-30-2007

Physical Location: off Hwy 87 6 Mi E of
Sorrento, LA 70000 Main Phone: 2814478601 ext 46

Mailing Address: 333 N Sam Houston Pkwy E Ste 1060
Houston, TX 77060

Location of Front Gate: 29° 54' 21" 8 hundredths latitude, 91° 34' 7" 2 hundredths longitude, Coordinate Method: Lat/Long - DMS, Coordinate Datum: NAD83

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Ronald Ivy	333 N Sam Houston Pkwy E Ste 1060 Houston, TX 77060	2814478601 (ext 46)	Responsible Official for
	Ronald Ivy	333 N Sam Houston Pkwy E Ste 1060 Houston, TX 77060	2814471009 (WF)	Air Permit Contact For
	Ronald Ivy	333 N Sam Houston Pkwy E Ste 1060 Houston, TX 77060	2814478601 (ext 46)	Air Permit Contact For
	Ronald Ivy	333 N Sam Houston Pkwy E Ste 1060 Houston, TX 77060	2814471009 (WF)	Responsible Official for

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Castex Energy Inc	333 N Sam Houston Pkwy E Ste 1060 Houston, TX 77060	2814478601 (WP)	Operates
	Castex Energy Inc	333 N Sam Houston Pkwy E Ste 1060 Houston, TX 77060	2814478601 (WP)	Air Billing Party for
	Castex Energy Inc	333 N Sam Houston Pkwy E Ste 1060 Houston, TX 77060	2814478601 (WP)	Owns

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-0775 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 154259 - Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field
 Activity Number: PER20080001
 Permit Number: 2660-00288-01
 Air - Minor Source/Small Source Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field						
EQT 0001	3-07-GR-BS - 375 MBTU/hr Glycol Regenerator-Burner Stack		.38 MM BTU/hr	.38 MM BTU/hr		8760 hr/yr
EQT 0002	4-07-GR-SCC - Glycol Regenerator-Still Column Condenser		15 MM ft ³ /day	15 MM ft ³ /day		8760 hr/yr
EQT 0003	5-07-ICE-ES - Internal Combustion Engine-Exhaust Stack (LP Gas Compressor)		215 horsepower	215 horsepower		8760 hr/yr
EQT 0004	6a-07-OST-CV - 400 BBL Oil Storage Tank-Common Vent	400 bbl	36500 bbl/yr	36500 bbl/yr		8760 hr/yr
EQT 0005	6b-07-OST-CV - 400 BBL Oil Storage Tank-Common Vent	400 bbl	36500 bbl/yr	36500 bbl/yr		8760 hr/yr
EQT 0006	6c-07-OST-CV - 400 BBL Oil Storage Tank-Common Vent	400 bbl	36500 bbl/yr	36500 bbl/yr		8760 hr/yr
EQT 0007	6d-07-OST-CV - 400 BBL Oil Storage Tank-Common Vent	400 bbl	36500 bbl/yr	36500 bbl/yr		8760 hr/yr
EQT 0008	6e-07-WST-CV - 400 BBL Water Storage Tank-Common Vent	400 bbl		127750 bbl/yr		8760 hr/yr
EQT 0009	6f-07-WST-CV - 400 BBL Water Storage Tank-Common Vent	400 bbl		127750 bbl/yr		8760 hr/yr
EQT 0010	7-07-LL - Loading Losses-Oil Transfer to Tank Truck		146000 bbl/yr	146000 bbl/yr		811 hr/yr
EQT 0011	8-07-F - Control Flare		96.1 MM scf/yr	96.1 MM scf/yr		8760 hr/yr
EQT 0012	9-07-LPS-WG - Low Pressure Separator-Waste Gas		80.6 MM scf/yr	80.6 MM scf/yr		8760 hr/yr
EQT 0013	10-07-HT-WG - Heater Treater-Waste Gas		2.2 MM scf/yr	2.2 MM scf/yr		8760 hr/yr
EQT 0014	11-07-GOP - Gas Operated Pump (Chemical Injection)		.15 MM scf/yr	.15 MM scf/yr		8760 hr/yr
EQT 0015	12-07-GOP - Gas Operated Pump (Chemical Injection)		.15 MM scf/yr	.15 MM scf/yr		8760 hr/yr
EQT 0016	13-07-GOP - Gas Operated Pump (Wilden M8)		.24 MM scf/yr	.24 MM scf/yr		52 hr/yr
EQT 0017	14-07-GOP - Gas Operated Pump (Wilden M8)		.45 MM scf/yr	.45 MM scf/yr		100 hr/yr
EQT 0018	15-07-BV - Blowcase Vessel (Condensed Liquids)		62652 gallons/yr	62652 gallons/yr		8760 hr/yr
EQT 0019	16-07-BV - Blowcase Vessel (Compressor Skid Fluids)		29200 gallons/yr	29200 gallons/yr		8760 hr/yr
EQT 0020	17-07-PC - Pneumatic Controllers					8760 hr/yr
EQT 0021	19-07-GPFS-WG - Glycol Pump Flash Separator-Waste Gas		8.6 MM scf/yr	8.6 MM scf/yr		8760 hr/yr
EQT 0022	24-08-GOP - Gas Operated Pump (Chemical Injection)		.15 MM scf/yr	.15 MM scf/yr		8760 hr/yr
EQT 0023	25-08-GOP - Gas Operated Pump (Chemical Injection)		.15 MM scf/yr	.15 MM scf/yr		8760 hr/yr
EQT 0024	26-07-BV - Blowcase Vessel (Flare Scrubber Fluids)		29200 gallons/yr	29200 gallons/yr		8760 hr/yr
FUG 0001	18-07-FE - Fugitive Emissions					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field							
EQT 0001	3-07-GR-BS - 375 MBTU/hr Glycol Regenerator-Burner Stack	7	165	.7		10	500
EQT 0003	5-07-ICE-ES - Internal Combustion Engine-Exhaust Stack (LP Gas Compressor)	1042	1215	.3	8	246	

INVENTORIES

AI ID: 154259 - Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field
Activity Number: PER20080001
Permit Number: 2660-00288-01
Air - Minor Source/Small Source Mod

Relationships:

ID	Description	Relationship	ID	Description
EQT 0011	Control Flare	Controls emissions from	EQT 0002	Glycol Regenerator-Still Column Condenser
EQT 0011	Control Flare	Controls emissions from	EQT 0021	Glycol Pump Flash Separator-Waste Gas
EQT 0011	Control Flare	Controls emissions from	EQT 0013	Heater Treater-Waste Gas
EQT 0011	Control Flare	Controls emissions from	EQT 0012	Low Pressure Separator-Waste Gas

Subject Item Groups:

ID	Group Type	Group Description
UNF 0001	Unit or Facility Wide	Facility - Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field

Group Membership:

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0040	0040 Crude Oil and Natural Gas Production (Less than 100 T/Yr Source)		

SIC Codes:

1311	Crude petroleum and natural gas	AI 154259
1311	Crude petroleum and natural gas	UNF 001

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 154259 - Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field
 Activity Number: PER20080001
 Permit Number: 2660-00288-01
 Air - Minor Source/Small Source Mod

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field															
EQT 0001 3-07-GR-BS	0.04	0.04	0.17	0.05	0.05	0.20	<0.01	<0.01	0.02	<0.01	<0.01	0.01	<0.01	<0.01	0.01
EQT 0003 5-07-ICEES	5.83	7.29	25.54	5.31	6.64	23.26	0.02	0.02	0.10	<0.01	<0.01	<0.01	0.13	0.16	0.55
EQT 0004 6a-07-OST-CV													0.33	11.11	1.43
EQT 0005 6b-07-OST-CV													0.33	11.11	1.43
EQT 0006 6c-07-OST-CV													0.33	11.11	1.43
EQT 0007 6d-07-OST-CV													0.33	11.11	1.43
EQT 0008 6e-07-WST-CV													<0.01	0.03	0.01
EQT 0009 6f-07-WST-CV													<0.01	0.03	0.01
EQT 0010 7-07-LL													38.61	61.78	15.66
EQT 0011 8-07-F	4.58	4.58	20.06	2.29	2.29	10.05	0.12	0.12	0.53	0.01	0.01	0.06	5.26	5.26	23.04
EQT 0014 11-07-GOP													0.10	0.10	0.43
EQT 0015 12-07-GOP													0.10	0.10	0.43
EQT 0016 13-07-GOP													25.28	25.28	0.66
EQT 0017 14-07-GOP													25.28	25.28	1.26
EQT 0018 15-07-BV													0.05	0.07	0.20
EQT 0019 16-07-BV													0.02	0.39	0.09
EQT 0020 17-07-PC													1.26	1.26	5.52
EQT 0022 24-08-GOP													0.10	0.10	0.43
EQT 0023 25-08-GOP													0.10	0.10	0.43
EQT 0024 26-07-BV													<0.01	0.04	0.01
FUG 0001 18-07-FE													0.70	0.70	3.05

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 154259 - Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field

Activity Number: PER20080001

Permit Number: 2660-00288-01

Air - Minor Source/Small Source Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0011 8-07-F	Benzene	0.03	0.03	0.13
UNF 0001 Facility	2,2,4-Trimethylpentane			0.07
	Benzene			0.36
	Ethyl benzene			0.02
	Formaldehyde			0.09
	Methanol			0.01
	Toluene			0.30
	Xylene (mixed isomers)			0.11
	n-Hexane			2.44

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 154259 - Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field

Activity Number: PER20080001

Permit Number: 2660-00288-01

Air - Minor Source/Small Source Mod

EQT 0001 3-07-GR-BS - 375 MBTU/hr Glycol Regenerator-Burner Stack

- 1 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified
- 2 [LAC 33:III.1313.C] Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified

EQT 0002 4-07-GR-SCC - Glycol Regenerator-Still Column Condenser

- 3 [40 CFR 63.774.d] Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Keep records of the information specified in 40 CFR 63.774(d)(1)(i) or (d)(1)(ii), as applicable. Subpart HH. [40 CFR 63.774(d)]
- 4 [LAC 33:III.2116.B.2] VOC, Total >= 85 % reduction using a control device. Demonstrate percent reduction using the methods found in LAC 33:III.2116.D.
Which Months: All Year Statistical Basis: None specified
- 5 [LAC 33:III.2116.D] Determine compliance with LAC 33:III.2116.B using the methods in LAC 33:III.2116.D.1-5, as appropriate.
- 6 [LAC 33:III.2116.F] Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep records of the information specified in LAC 33:III.2116.F.1 and 2.

EQT 0003 5-07-JCE-ES - Internal Combustion Engine-Exhaust Stack (LP Gas Compressor)

- 7 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C, LAC 33:III.1101.B]
Which Months: All Year Statistical Basis: Six-minute average

EQT 0011 8-07-F - Control Flare

- 8 [LAC 33:III.1105] Opacity <= 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets.
Which Months: All Year Statistical Basis: None specified
- 9 [LAC 33:III.1105] Submit notification: Due to SPOC as soon as possible after the start of burning of pressure valve releases for control over process upsets. Notify in accordance with LAC 33:1.3923. Notification is required only if the upset cannot be controlled in six hours.
VOC, Total >= 85 % reduction. Demonstrate percent reduction using the methods found in LAC 33:III.2116.D. [LAC 33:III.2116.B.2, LAC 33:III.501.C.6]
- 10 [LAC 33:III.2116.B.2] Which Months: All Year Statistical Basis: None specified
- 11 [LAC 33:III.2116.B.3] Presence of a flame monitored by visual inspection/determination daily. [LAC 33:III.2116.B.3, LAC 33:III.501.C.6]
- 12 [LAC 33:III.2116.B.3] Which Months: All Year Statistical Basis: None specified
- Flare gas: Heat content > 300 BTU/scf. [LAC 33:III.2116.B.3, LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 154259 - Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field

Activity Number: PER20080001

Permit Number: 2660-00288-01

Air - Minor Source/Small Source Mod

EQT 0011 8-07-F - Control Flare

- | | | |
|----|----------------------|---|
| 13 | [LAC 33:III.2116.D] | Determine compliance with LAC 33:III.2116.B using the methods in LAC 33:III.2116.D.1-5, as appropriate. [LAC 33:III.2116.D, LAC 33:III.501.C.6] |
| 14 | [LAC 33:III.2116.F] | Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep records of the information specified in LAC 33:III.2116.F.1 and 2. [LAC 33:III.2116.F, LAC 33:III.501.C.6] |
| 15 | [LAC 33:III.501.C.6] | Develop a corrective action plan for re-lighting the flare. Plan must be kept readily available for immediate implementation in the event the flare needs to be re-lit. |
| 16 | [LAC 33:III.501.C.6] | Flare gas: Heat content monitored by gas analysis annually, to insure the heat content is above 300 BTU/scf.
Which Months: All Year Statistical Basis: None specified |
| 17 | [LAC 33:III.501.C.6] | Presence of a flame recordkeeping by electronic or hard copy daily. |
| 18 | [LAC 33:III.501.C.6] | Flare gas: Heat content recordkeeping by electronic or hard copy annually. |

FUG 0001 18-07-FE - Fugitive Emissions

- | | | |
|----|-------------------|--|
| 19 | [LAC 33:III.2111] | Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment. |
|----|-------------------|--|

UNF 0001 Facility - Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field

- | | | |
|----|---------------------|--|
| 20 | [40 CFR 63] | All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 2 of 40 CFR 63 Subpart HH. |
| 21 | [LAC 33:III.1103] | Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited. |
| 22 | [LAC 33:III.1109.B] | Outdoor burning of waste material or other combustible material is prohibited. |
| 23 | [LAC 33:III.1303.B] | Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited. |
| 24 | [LAC 33:III.2113.A] | Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5. |
| 25 | [LAC 33:III.219] | Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance. |
| 26 | [LAC 33:III.5611.A] | Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority. |
| 27 | [LAC 33:III.5611.B] | During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations. |

COPY



August 18, 2008

Louisiana Department of Environmental Quality
Office of Environmental Services
Permits Division
PO Box 4313
Baton Rouge, LA 70821-4313
Attn.: James Davies

original to IOA

copy to Bu Petre/Gp3/Dam

RE: ADDITIONAL INFORMATION

Castex Energy, Inc.

Adeline Sugar Factory Co LTD #1 Production Facility - Jeanerette Field

Permit No.: 2660-00288-00; AI No.: 154259; Activity No.: PER20080001

St. Mary Parish, LA

On behalf of Castex Energy, Inc. (Castex) and in accordance with LAC 33:III.5, please find enclosed three (3) sets of the above referenced supplemental information submitted for replacement into the original package submitted in July 2008. A \$449 check was included with the permit application submitted in July 2008.

This supplement addresses revised emission limits for EPN: 4-07-GR-SCC (glycol still column condenser), EPN: 8-07-F (control flare), EPN: 15-07-BV (blowcase vessel), EPN: 17-07-PC (pneumatic controllers) and EPN: 19-07-GPFS-WG (glycol pump flash separator waste gas vent) based on a reconciled glycol circulation rate. The appropriate pages of the application, EIQ sheets, and supplemental data (i.e. calculations, supporting documentation) have been updated and are enclosed.

If any other information is required regarding these matters, please do not hesitate to contact me at (337) 839-1075. All written correspondence should be directed to: **Castex Energy, Inc., 4111 Hwy. 311, Houma, LA 70360, Attn.: Darren Small.** Thank-you in advance for your assistance with this matter.

Sincerely,
HLP ENGINEERING, INC.

Stormy B. Mandella
Stormy B. Mandella

Encl.

XC: Darren Small - Castex

6/23/10

2008 AUG 19 AM 10:13